

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

In Re:	: CHAPTER 13
	:
HEATH CAMRON STEWART and	: CASE NO. 17-10252
TERESA LYNN STEWART,	:
	: JUDGE JIMMY L. CROOM
Debtors.	:

AMENDED OBJECTION TO CONFIRMATION OF DEBTOR'S PLAN

Comes now, Federal National Mortgage Association ("Fannie Mae") ("Creditor"), a secured creditor of the above Debtors, and objects to confirmation of the Debtors's plan, as proposed. In support, Creditor shows:

1. Creditor is an entity entitled to enforce a Note secured by a Security Deed on Debtor's real property located at 58 WINSTON PL, JACKSON, TN 38305 (the "Property").
2. Debtors filed this Chapter 13 case on February 3, 2017. The Chapter 13 Plan filed herein provides for the repayment of the pre-petition arrearage claim through the Plan, with the continuing monthly payments to Creditor to be paid by the Trustee beginning March 1, 2017.
3. Secured Creditor anticipates filing a Proof of Claim which sets forth a total indebtedness in the approximate amount of \$148,751.29 and a pre-petition arrearage of \$10,880.16 .
4. The Chapter 13 Plan filed by the Debtors fails to provide sufficient payments to Secured Creditor for both the pre-petition arrearage in the amount of \$10,880.16 in violation of 11 U.S.C. §1322(b)(3) and 1325(a)(5).
5. This is Debtors's second (2nd) case with one (1) pending case dismissed within the prior year. Bankruptcy case number 13-10575 was filed on March 8, 2013 and dismissed on January 19, 2017.
6. Debtors's Plan fails to comply with the provisions of 11 U.S.C. § 1325(a); and, has not been proposed in good faith as required by 11 U.S.C. § 1325(a)(3).

WHEREFORE, Creditor prays for (a) an Order denying confirmation of Debtors's Plan, as proposed; and (b) for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

/s/ Lori L. McGowan

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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and exact copy of the foregoing document has been served electronically, through the Court's electronic filing system to all parties indicated on the electronic filing receipt, on March 17, 2017, or by United States mail, postage prepaid, to the parties below.

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